



Fw: Delay in Corrective Action Milestones

Carolyn Copper to: Chad Kincheloe, Steve Hanna, Jill Trynosky
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01/09/2013 10:18 AM

From: Carolyn Copper/OIG/USEPA/US
To: Chad Kincheloe/R5/USEPA/US@EPA, Steve Hanna/OIG/USEPA/US@EPA, Jill Trynosky/OIG/USEPA/US@EPA

fyi.. for our PMRS records.

Carolyn Copper, Ph.D.
Assistant Inspector General for Program Evaluation
Office of Inspector General
U.S. Environmental Protection Agency
Washington, DC
202-566-0829

----- Forwarded by Carolyn Copper/OIG/USEPA/US on 01/09/2013 01:17 PM -----

From: Mathy Stanislaus/DC/USEPA/US
To: Carolyn Copper/OIG/USEPA/US@EPA
Cc: Johnsie Webster/DC/USEPA/US@EPA
Date: 01/09/2013 01:12 PM
Subject: Delay in Corrective Action Milestones
Sent by: Ellyn Fine

In accordance with the requirements of EPA Manual 2750, this email is to notify you that the following audit corrective action milestones will be delayed by more than six months past the original agreed-to date. The revised dates and reason for the delays have been documented in the Agency's Management Audit Tracking System (MATS). If you have any questions, please contact Johnsie Webster at (202) 566-1912.

EPA Promoted the Use of Coal Ash Products With Incomplete Risk Information (11- P00173)

Corrective Action 1-1: *Planned:* 2012-04-30 *Completed:* 0000-00-00
OSWER expects to complete internal development of the process or evaluation hierarchy for encapsulated beneficial uses by April, 2012.

December 2012 update: The OSWER AA approved the revision of this milestone date from 09/30/12 to 09/30/13. The Agency will complete the Beneficial Use Methodology by September 2013; the additional time is required to gather more data and test the Methodology before its final release .

EPA Should Clarify and Strengthen Its Waste Management Oversight Role With Respect to Oil Spills (11-P00706)

Corrective Action 1-1: *Planned:* 2012-12-31 *Completed:* 0000-00-00
Corrective Action 1.a - EPA will develop waste management oversight procedures for ACPs for responses to SONS in accordance with the proposed corrective action for Recommendation 1.b. EPA will also propose adding language to National Response Framework Emergency Support Function #10 annex that outlines EPA's waste management oversight capabilities as a support agency. EPA will submit draft revisions for ESF #10 to FEMA no later than December 31, 2012.

December 2012 Update: The OSWER AA approved revision of this milestone date from 12/31/12 to 09/30/13. EPA continues to work on two documents (model waste management plan guidance , and exploration and production (E&P) waste guidance) that will inform and impact the update to ESF #10. We

expect those documents to be completed by June 2013. Revisions to ESF#10 language should be relatively straightforward after those documents are complete , and thus we propose to change the expected completion date for submitting draft revisions for ESF #10 to FEMA to September 2013. The following should also be noted . While FEMA did complete a revision to ESFs earlier in 2012, it was much earlier than originally anticipated . Based on that timing , we were not able to provide some general language that we anticipated would be consistent with the two documents mentioned above when they are completed . We anticipate that the next FEMA revisions to the ESFs will be within 18 months of the issuance of the forthcoming update to the National Response Framework , and EPA will ensure that the latest and most appropriate language will be submitted as part of that revision process . *Status:* Delayed

Corrective Action 1-3: Planned: 2012-06-29 Completed: 0000-00-00
Corrective Action 1.c. - Prepare final waste management plan

December 2012 update: The OSWER AA approved the revision of this milestone date from 12/28/12 to 06/28/13. The additional time is required to continue coordination with other Federal /State agencies.

Corrective Action 2-1: Planned: 2012-06-29 Completed: 0000-00-00
Prepare final E&P memorandum

December 2012 Update: The OSWER AA approved the revision of this milestone date from 12/28/12 to 06/28/13. The additional time is required to continue coordination with other Federal /State agencies.

Mathy Stanislaus
USEPA Assistant Administrator
Office of Solid Waste & Emergency Response



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
RESOURCE CONSERVATION
AND RECOVERY

MEMORANDUM

SUBJECT: Completion of Corrective Action Milestone for "*EPA Promoted the Use of Coal Ash Products with Incomplete Risk Information*"

FROM: Suzanne Rudzinski *Suzanne Rudzinski*
Director, Office of Resource Conservation and Recovery

TO: Johnsie Webster
Audit Follow-Up Coordinator (AFC)

Date: September 28, 2012

In response to the OIG's Evaluation Report, *EPA Promoted the Use of Coal Ash Products with Incomplete Use Information*, Recommendation 2, we are submitting the following information which meets the corrective action in our response. If you have any questions, please contact me at 703.308.8895.

Recommendation 2: Determine if further EPA action is warranted to address historical CCR structural fill applications, based on comments on the proposed rule and other information available to EPA.

Corrective Action 2-1: OSWER will provide milestones for determining whether further action is warranted to address historical CCR structural fill applications by the end of FY2012.

EPA continues to review the over 450,000 comments submitted on the proposed rule. We will consider whether further action is warranted to address historical CCR structural fill applications, and expect to make a determination on that issue by December 31, 2013.

OIG Recommendation

Status/Dates

Corrective Action

Define and implement risk evaluation practices to determine the safety of the CCR beneficial uses EPA promotes.

[Update](#)[Reset](#)[Delete Rec](#)[Add CA](#)

Status: Complete ▾

Planned: 2012-04-30

Agency Revised: 2013-09-30

Completed: 2013-09-30

OSWER expects to complete internal development of the process or evaluation hierarchy for encapsulated beneficial uses by April, 2012.

[Update](#)[Reset](#)

Status: Adhering ▾

Planned: 2014-03-30

Agency Revised: 0000-00-00

Completed: 0000-00-00

OSWER expects to complete development of the conceptual model for evaluating risks from unencapsulated uses by the second quarter of FY 2014.

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Determine if further EPA action is warranted to address historical CCR structural fill applications, based on comments on the proposed rule and other information available to EPA.

[Update](#)[Reset](#)[Delete Rec](#)[Add CA](#)

Status: Complete ▾

Planned: 2012-09-28

Agency Revised: 0000-00-00

Completed: 2012-09-28

OSWER will provide milestones for determining whether further action is warranted to address historical CCR structural fill applications by the end of FY 2012.

[Update](#)[Reset](#)